

6. **Interrogatories.** The parties may serve interrogatories limited to Twenty-Five (25) single questions including subparts, on or before, which shall be responded to within the time provided by the Federal Rules or within thirty (30) days of Plaintiff's service of the RICO Case Statement, whichever comes later.
7. **Document Requests.** The parties may serve requests for production of documents on or before March 19, 2022, which shall be responded to within thirty (30) days of Plaintiff's service of the RICO Case Statement.
8. **Depositions.** The number of depositions to be taken by each side shall not exceed 10 witnesses, without leave of court.
9. **Electronic Discovery.** The parties are directed to Rule 26(f), as amended, which, *inter alia*, addresses preservation of discoverable information, discovery of electronically stored information, and claims of privilege or work product protection. The parties are also directed to Local Civil Rule 26.1(d) which describes the obligations of counsel with regard to their clients' information management systems.
10. **Discovery Disputes.** Please refer to the Court's Civil Case Management Order.
11. **Motion Practice.** Please refer to the Court's Civil Case Management Order.
12. **Expert Reports.** All affirmative expert reports shall be delivered within sixty (60) days of the close of fact discovery. All responsive expert reports shall be delivered within sixty (60) days of service of affirmative expert reports. Depositions of all experts to be completed within 60 days after service of responsive expert reports.
13. **Form and Content of Expert Reports.** All expert reports must comport with the form and content requirements set forth in Rule 26(a)(2)(B). No expert shall testify at trial as to any opinions or base those opinions on facts not substantially disclosed in the expert's report.
14. **Extensions and Adjournments.** Please refer to the Court's Civil Case Management Order.
15. **Protective Orders.** Any proposed confidentiality order agreed to by the parties must strictly comply with Rule 26(c), Local Civil Rule 5.3, and applicable case law. Please also refer to the Court's Civil Case Management Order.
16. **Local Rules.** The parties are directed to the Local Civil Rules for any other matter not addressed by this Order or the Court's Civil Case Management Order.
17. **FAILURE TO COMPLY WITH THE TERMS OF THIS ORDER OR ANY OTHER ORDERS WILL RESULT IN SANCTIONS.**

s/ Cathy L. Waldor

CATHY L. WALDOR

United States Magistrate Judge